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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 ATLP, a minor, by and through his Guardian Ad Litem TAYLORIA TAYLOR; and AJB, a minor by and through his Guardian Ad Litem TAYLORIA TAYLOR and TAYLORIA TAYLOR as Co-Special Administrator of the ESTATE OF BRANDON LAVON PATTON, Deceased,

CASE NO.: 2:21-cv-02072-JCM-EJY

13 Plaintiffs,

14 vs.

15 CORECIVIC, INC, formerly CORRECTIONS CORPORATION OF AMERICA, a foreign corporation d/b/a Nevada Southern Detention Center; DOE CORECIVIC EMPLOYEES I through XX; DOES I through X; and ROE ENTITIES I through X, inclusive,

16 **STIPULATION AND (PROPOSED)
ORDER TO EXTEND DEADLINE FOR
PLAINTIFFS' RESPONSE TO
CORECIVIC'S MOTION FOR
JUDGMENT ON THE PLEADINGS
AND CORECIVIC'S REPLY IN
SUPPORT [ECF 97]**

17 Defendants.

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 21 Tayloria Taylor, as Special Administrator of the Estate of Brandon Lavon Patton, deceased, by and through his counsel, Paola M. Armeni, Esq. and Gia N. Marina, Esq., of the law firm of Clark Hill, PLLC and Defendant CoreCivic, Inc., by and through their counsel, Kristina R. Rood of Struck Love Bojanowski & Acedo, PLC and Gina G. Winspear of Dennett Winspear, LLP, hereby respectfully submit this Stipulation and Order Extending Time for Plaintiff to Respond to Defendant's Motion for Judgment on the Pleadings [ECF 97] filed on February 2, 2024, which the response is currently due on March 1, 2024, to be extended an additional seven (7) days up to and including March 8, 2024.

22 Although Plaintiff's counsel has been actively working on responding to Defendant's

1 Motion for Judgment on the Pleadings, counsel requires a brief extension to complete the
2 Response. Further, as Defendant's counsel will be out of the jurisdiction when Plaintiffs'
3 Response is filed, Defendant requests a brief extension for a Reply brief. This request for extension
4 is made in good faith and not for the purposes of delay.

5 WHEREFORE, the parties stipulate that the time for Plaintiffs to file their Response to
6 Defendant's Motion for Judgment on the Pleadings [ECF 97], be extended an additional seven (7)
7 days up to and including March 8, 2024, and otherwise stipulated or ordered, Defendant's Reply
8 to Plaintiffs' Response be due on March 26, 2024.

9 APPROVED AS TO FORM AND CONTENT.

10 Respectfully submitted this 27th day of February 2024.

11 **CLARK HILL, PLLC**
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13 /s/ *Gina N. Marina, Esq.*

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**STRUCK LOVE BOJANOWSKI &
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/s/ *Kristina R. Rood*

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22 **ORDER**

23 **IT IS SO ORDERED:**

24 DATED: February 28, 2024.

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27 UNITED STATES MAGISTRATE JUDGE
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